

Belinda Escobosa Helzer (pro hac vice)
Adrian Hernandez (pro hac vice)
Ernest Herrera (pro hac vice)
MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND
634 S. Spring St., 11th Floor
Los Angeles, CA 90014
Telephone: (213) 629-2512
Facsimile: (213) 629-0266
bescobosa@maldef.org
ahernandez@maldef.org
eherrera@maldef.org

F. Travis Buchanan, Esq.
NV Bar No. 9371
The Cochran Firm – Las Vegas
701 E. Bridger, Suite 540
Las Vegas, NV 89101
Telephone: (702) 331-5478
Facsimile: (702) 629-6919
FtbLaw@gmail.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ALICIA INES MOYA GARAY, JUAN
JAIME LOPEZ-JIMENEZ, and
ARRIBA LAS VEGAS WORKER
CENTER,

Plaintiffs,

vs.

CITY OF LAS VEGAS, a municipality;
MICHELE FREEMAN, in her official
capacity as City of Las Vegas Chief of
Department of Public Safety;
BANANTO SMITH, in his official
capacity as Deputy Chief of Detention
Services; DOES 1 through 25, inclusive,

Defendants.

Case No. 2:20-cv-00119-GMN-EJY

**STIPULATION AND ~~PROPOSED~~ ORDER
TO FILE SECOND AMENDED COMPLAINT**

**STIPULATION AND ~~[PROPOSED]~~ ORDER TO FILE SECOND
AMENDED COMPLAINT**

Plaintiffs Alicia Ines Moya Garay, Juan Jaime Lopez-Jimenez, and Arriba Las Vegas Worker Center (“Plaintiffs”) and Defendants City of Las Vegas, Michele Freeman, and Bananto Smith (“Defendants” and, together with Plaintiffs, the “Parties”) hereby stipulate and agree as follows:

WHEREAS, pursuant to Federal Rule of Civil Procedure 15(a)(2), LR 7-1, and LR IA 6-2, Plaintiffs have requested that Defendants consent to Plaintiffs’ filing of a second amended complaint, a copy of which is attached hereto as Exhibit A;

WHEREAS, solely to conserve the Parties’ and judicial resources, Defendants consent to the filing of the second amended complaint;

WHEREAS, by entering into this stipulation, Defendants take no position as to the merits or substance of the claims alleged in the second amended complaint. Defendants hereby expressly reserve any and all rights, argument or defenses they have with respect to responding to the second amended complaint as well as the claims asserted therein.

Accordingly, it is hereby stipulated and agreed that:

1. Plaintiffs may file the proposed second amended complaint attached as Exhibit A hereto.
2. The second amended complaint shall be deemed filed and served once filed through the Court’s ECF System.

///

///

///

///

///

///

///

///

3. Defendants shall respond to the second amended complaint—by answer, motion or otherwise—no later than thirty (30) days after the Court enters the order granting the stipulation to file the second amended complaint.

Dated: December 28, 2020

MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND

By: /s/ Adrian Hernandez
Belinda Escobosa Helzer
Adrian Hernandez
Ernest Herrera
MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND
634 S. Spring St., 11th floor
Los Angeles, CA 90014
Telephone: (213) 629-2512
Facsimile: (213) 629-0266

F. Travis Buchanan, Esq.
NV Bar No. 9371
The Cochran Firm – Las Vegas
701 E. Bridger, Suite 540
Las Vegas, NV 89101
Telephone: (702) 331-5478
Facsimile: (702) 629-6919
FtbLaw@gmail.com

Attorneys for Plaintiffs

BRYAN SCOTT
City Attorney

By: /s/ Seth T. Floyd
Deputy City Attorney
Nevada Bar No. 11959
Philip R. Byrnes
Senior Litigation Counsel
Nevada Bar No. 166
495 South Main Street, Sixth Floor
Las Vegas, NV 89101

Attorneys for Defendants

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: December 28, 2020